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Attorneys for Defendant
GOOGLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiffs,

V.

GOOGLE INC.,

Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF RENNY HWANG IN
SUPPORT OF DEFENDANT GOOGLE
INC.'S ADMINISTRATIVE MOTION TO
SEAL MOTIONS IN LIMINE AND
CORRESPONDING EXHIBITS**

Dept. Courtroom 8, 19th Fl.
Judge: Hon. William Alsup

1 I, RENNY HWANG, declare as follows:

2 1. I am an attorney employed by Google Inc. (“Google”), where I have served as
3 senior litigation counsel for the last six years. My job responsibilities include, but are not limited
4 to, supervising our outside counsel in connection with litigation matters (such as this one), as well
5 as familiarizing myself with the areas of Google’s businesses and documentation concerning
6 those businesses as they related to litigation matters under my supervision. I submit this
7 declaration in support of Google’s Motion to Seal Motions in Limine and Corresponding
8 Exhibits. I have knowledge of the facts set forth herein, and if called upon as a witness, I could
9 testify to them competently under oath.

10 2. I have reviewed the materials listed in Google’s Motion to Seal Motions in Limine
11 and Corresponding Exhibits. The materials listed contain Google’s extremely confidential and
12 commercially sensitive financial information. Google does not publically allocate revenue or
13 profits to Android separate and apart from Google’s general business. Google considers that non-
14 public financial data to be highly sensitive, and public disclosure of the information described
15 herein could have significant negative effects on Google’s business.

16 3. In addition, the materials listed in Google’s Motion to Seal Motions in Limine and
17 Corresponding Exhibits contain sensitive information related to Google’s agreement with third
18 parties. Google has always treated it as such. The information within the agreements is subject to
19 stringent confidentiality requirements contained within the relevant agreement. Indeed, Google
20 places strict limits on who has access to the terms of these agreements to ensure confidentiality is
21 retained. Also, Google does not disclose this information to the public. Public disclosure of this
22 information could severely and adversely impact Google’s ability to negotiate, among other
23 things, similar terms with other third parties in connection with similar agreements now or in the
24 future.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct to the best of my knowledge.

3

4 Executed this 23rd day of March, 2016 at San Francisco, California.

5

6 By: *Renny Hwang*
7 RENNY HWANG

8

9 ATTESTATION OF FILER

10 I, Robert A. Van Nest, have obtained Renny Hwang's concurrence to file this document
11 on his behalf.

12 Dated: March 23, 2016

13 KEKER & VAN NEST LLP

14 By: */s/ Robert A. Van Nest*
15 ROBERT A. VAN NEST
16 CHRISTA M. ANDERSON
17 DANIEL PURCELL

18 Attorneys for Defendant
19 GOOGLE INC.